

AO 91 (Rev. 11/11) Criminal Complaint

United States Courts
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

APR 20 2015

for the

Southern District of Texas

David J. Bradley, Clerk of Court

United States of America)

v.)

Calvin James Smith)

Jamone Eduin Jones)

Jerrol Dewayne Bluford)

Rodney Ford)

Case No.

H15-508 M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 1/25/2015 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C section 1951(a)	Interference with commerce by robbery
18 U.S.C section 1951(a)	Conspiracy to Interfere with commerce by robbery
18 U.S.C section 924(c)(1)(A)(ii) & 2	Carrying and brandishing a weapon

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.


Complainant's signature

Bryan Ellis, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

April 20, 2015

City and state:

Houston, Texas



Judge's signature

Frances H. Stacy, US Magistrate Judge

Printed name and title

AFFIDAVIT

I, Bryan M. Ellis, (hereafter Affiant), being duly sworn, do hereby depose and state:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) assigned to the FBI Violent Crimes Task Force (VCTF), which is comprised of agents from the FBI, officers from the Houston Police Department (HPD), and deputies from the Harris County Sheriff's Office (HCSO). I have been a Special Agent with the FBI for approximately 5 years. Based on my training and experience as an FBI agent, I am familiar with federal firearms laws and the Hobbs Act. As an FBI agent I have been involved in numerous Hobbs Act investigations.
2. This affidavit is submitted in support of an arrest warrant and criminal complaint charging CALVIN JAMES SMITH, DOB: 04/25/1996, JERROL DEWAYNE BLUFORD, DOB: 06/23/1993, JAMONE EDUIN JONES, DOB: 05/21/1994, and RODNEY FORD, DOB: 01/24/1997 with:
 - a. Interference with commerce by robbery, in violation of 18 U.S.C. Section 1951(a)
 - b. Carrying and brandishing a weapon, in violation of 924c(1)(A)(ii) and 2, and
 - c. Conspiracy to interfere with commerce by robbery, in violation of 18 U.S.C. Sections 1951(a).
3. The facts contained in this affidavit are based upon information provided to me by other law enforcement officers, other witnesses, and my own personal knowledge. Since this affidavit is made for the limited purpose of supporting a criminal complaint, I have not set forth each and every fact learned during the course of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the crime charged. Unless otherwise indicated, where actions, conversations, and statements of others are related herein, they are related in substance and in part only.
4. Since January 22, 2015, Special Agents of the FBI have been conducting a joint investigation with the Harris County Sheriff's Office (HCSO) and the Houston Police Department (HPD) into a robbery crew consisting of SMITH, BLUFORD, JONES, and FORD for the commission of multiple commercial business robberies. Each robbery was an armed take-over style robbery during which one member of the robbery crew brandished a firearm. Additionally, during each robbery the crew members demanded money from the employee or employees at gunpoint, taking cash from

registers and safes through threat of force. In addition to taking the business proceeds, the crew members also stole merchandise, such as cellular telephones from the businesses.

5. On January 25, 2015, investigation revealed at approximately 4:29 PM, four suspects entered the Metro PCS, located at 834 Little York Road, Houston, Texas. All four suspects were wearing hoodies. Immediately upon entering the Metro PCS, Suspect #1 brandished a handgun and pointed it at the sole employee working at the Metro PCS. While pointing the handgun at the employee, Suspect #1 followed the employee behind the counter area where the cash registers were located. The suspects then demanded money from the employee and asked her to open the cash register drawer. Suspect #1 stood behind the register counter with the employee, pointing the hand gun at the employee several times, while Suspect #3 opened the register behind the counter and removed money from the register. Suspect #2 entered the rest room area of the Metro PCS, where the business kept a safe. Suspect #4 then followed Suspect #2 into the rest room area where the safe was located. A short time later, Suspect #2 left the rest room area of the Metro PCS, and went to the counter where the registers were located. Suspect #2 then pulled open several of the drawers behind the counter. Suspect #1 then left the counter area where the registers were located and entered the rest room area of the Metro PCS. Soon thereafter, Suspect #1 and Suspect #4 left the rest room area and returned to the front counter area. All four suspects then searched the register counter area before exiting the Metro PCS. Approximately \$935 in United States currency was taken by the suspects from the registers and safe in the Metro PCS.
6. Based on video surveillance, witness statements, suspect confessions, and other investigative activity related to additional robberies occurring between January 21-25, 2015, the suspects were identified as follows: Suspect #1: JERROL DEWAYNE BLUFORD, Suspect #2: CALVIN JAMES SMITH, Suspect #3: JAMONE EDUIN JONES and, Suspect #4: RODNEY FORD.
7. Further investigation revealed BLUFORD, SMITH, JONES, and FORD, were responsible for four additional robberies occurring between January 21, 2015, and January 25, 2015.
8. On January 21, 2015, based on video surveillance and a witness statement, investigation revealed at approximately 1:20 PM, FORD, SMITH and JONES robbed the Boost Mobile business located at 6133 West FM 1960, Houston, Texas. FORD, SMITH and JONES were all wearing hoodies. FORD brandished a weapon, pointed it at the owner of the business, and told the owner to open the register and give him all the money. SMITH then took money from the register at the counter, while JONES proceeded to check a back office area of the business. After taking money from the register, FORD, SMITH, and JONES left the business and entered a white Lexus. Approximately \$300 dollars in United States currency was taken from the Boost Mobile. On January 23, 2015, investigators

provided the owner of the Boost Mobile business with a photographic line-up wherein the owner identified SMITH as one of the suspects in the robbery. On January 26, 2015, investigators conducted a custodial interview of FORD. During the interview, FORD was shown a still image of an individual from the video surveillance of the robbery at the Boost Mobile business. FORD identified the still image as himself. On January 27, 2015, investigators provided the owner of the Boost Mobile business with two more photographic line-ups wherein the owner identified JONES and FORD with 100 percent certainty as the two other suspects who committed the robbery. On January 27, 2015, SMITH was arrested while at the Harris County Court House for an outstanding warrant for aggravated robbery. On that same date, during a custodial interview, SMITH admitted to investigators he committed the robbery at the Boost Mobile business. SMITH also implicated JONES, FORD, and BLUFORD as taking part in the robbery. SMITH stated they drove to the Boost Mobile business in the white Lexus. Based on subsequent investigation and interviews, it was revealed, BLUFORD remained in the Lexus during the robbery.

9. On January 21, 2015, approximately one hour after the robbery at the Boost Mobile business, SMITH, JONES and FORD committed a robbery of the Cricket business located at 13763 SH 249, Houston, Texas. SMITH, JONES and FORD were identified based on video surveillance and a witness statement. All three were wearing the same clothes as in the Boost Mobile robbery. After entering the front door of the business, FORD pulled out a handgun and pointed it at the sole employee of the business and demanded money. SMITH, JONES, and FORD then took money from the businesses cash register. FORD, SMITH, and JONES then asked the employee where the safe was. FORD, SMITH, and JONES followed the employee to a back area where the safe was located. While being held at gunpoint, the employee opened the safe. FORD, SMITH, and JONES took approximately \$2000 in United States currency from the safe and \$355 in United States currency from the cash register. FORD, SMITH, and JONES then left the business. During a custodial interview on January 27, 2015, SMITH admitted to taking part in the robbery with JONES, FORD, and BLUFORD. SMITH also admitted BLUFORD remained in the Lexus during the robbery.
10. On January 23, 2015, at approximately 10:00 PM, BLUFORD, SMITH, JONES, and FORD committed a robbery at the McDonald's located at 12085 Veterans Memorial Drive, Houston, Texas. At the time of the robbery, the McDonalds was occupied by customers, including a young child. All four suspects entered the McDonalds wearing hoodies. JONES walked up to one of the registers and began to make an order when BLUFORD pulled out a handgun and pointed it in the face of one of the employees. BLUFORD then held the handgun up to the back of the head of one of the managers and told him to open the registers. BLUFORD and JONES then took cash from the registers located at the front of the McDonalds.

SMITH and FORD went to a back office where the safe was located. Another manager was forced to open the safe. After taking money from the safe, SMITH and FORD returned to the front of the store, where all four subjects then left. The subjects took approximately \$2867 in United States currency from the robbery. On January 27, 2015, during the custodial interview, SMITH was shown a news story that Channel 11 Houston had aired regarding the robbery of the McDonalds. After viewing the video from the news story, SMITH identified everyone involved in the robbery, stating JONES, BLUFORD, and FORD were also involved with him in the robbery. SMITH stated BLUFORD was the individual with the handgun. On February 6, 2015, during a custodial interview, JONES admitted to being at the McDonalds located at 12085 Veterans Memorial.

11. On January 25, 2015, at approximately 5:00 PM BLUFORD, SMITH, JONES and FORD committed a robbery of the McDonalds located at 7518 North Freeway, Houston, Texas. BLUFORD, SMITH, JONES and FORD were identified based on video surveillance. All the suspects were wearing the same clothing as in the robbery of the Metro PCS committed on January 25, 2015. After entering the McDonalds, BLUFORD pulled out a handgun and pointed it at one of the employees at the front register. BLUFORD demanded the registers be opened. SMITH, FORD, and BLUFORD then went behind the counter and went to where the safe was located. JONES stayed at the front of the business, behind the counter where the registers were located. SMITH, FORD, and BLUFORD then had a manager open the back safe, from which they took money. SMITH and BLUFORD then went back to the front registers, and at gunpoint BLUFORD demanded the cash registers be opened. SMITH then took money from the businesses cash registers. SMITH, JONES, BLUFORD and FORD then left the McDonalds. Approximately \$1365 in United States currency was taken from McDonalds.
12. On January 25, 2015, approximately 30 minutes after the robbery at the McDonalds located at 7518 North Freeway, BLUFORD and FORD committed a robbery of the Boost Mobile located at 9922 North Freeway, Houston, Texas. BLUFORD and FORD were wearing the same clothes as in the robbery at the McDonalds located at 7518 North Freeway, and the Metro PCS, located at 834 Little York. After entering the Boost Mobile, and looking around the store, BLUFORD pulled out a handgun and pointed it at the owner of the Boost Mobile. BLUFORD and FORD both demanded money from the storeowner. FORD hopped the counter and began removing money from the cash register. Another customer entered the store while the robbery was ongoing. BLUFORD pointed the handgun at the customer and forced him to remain in the store. BLUFORD then went behind the counter where FORD was and they demanded the storeowner hand over his car keys. After taking the money and two iPhones, BLUFORD and FORD ran out of the store. BLUFORD entered the storeowner's vehicle, but was unable to start it. After failing to steal the car, BLUFORD entered a

white Lexus with paper tags and fled the scene. Approximately \$500 in United States currency and two iPhones which were merchandise of the Boost Mobile were taken.

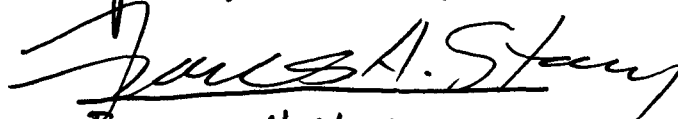
13. On January 25, 2015, HPD Officers listened to three robbery calls that had been made within a short period of time. Officers on those calls had the same suspect vehicle description, a white four door Lexus with paper tags, containing three to four black males armed with a handgun. Based on that description, and the last known direction of travel of the Lexus, HPD Officers parked near 12300 North Freeway in the Greenspoint Mall parking lot identified a vehicle matching that description. At approximately 5:06 PM, HPD officers initiated a traffic stop on the white Lexus. The Lexus refused to stop and a vehicle pursuit ensued. During the pursuit, the white Lexus hit a curb at a high rate of speed and came to a stop. Four black males exited the vehicle and fled. The driver of the Lexus was seen wearing a black and white camo hooded sweatshirt as he exited the vehicle, the same sweatshirt seen worn by FORD in the robberies committed at the Metro PCS, McDonalds, and Boost Mobile on January 25. After a foot pursuit, two of the suspects, FORD and JONES, were apprehended. During the foot pursuit, FORD discarded the camouflaged hooded sweatshirt. The sweatshirt was recovered. FORD also had the key fob for the Lexus in his front right shorts pocket. JONES had approximately \$955 in US currency in his sock and pocket. After the apprehension of FORD and JONES, the storeowner for the Boost Mobile located at 7518 North Freeway was brought to the scene. At the scene he viewed a live line-up where he identified FORD as one of the individuals who committed the robbery of his store. The storeowner misidentified JONES as the other robbery suspect. SMITH and JONES remained in the Lexus while BLUFORD and FORD committed the robbery.
14. Numerous other items were located in the Lexus, including two stolen iPhones taken from the robbery of the Boost Mobile on 9922 North Freeway, and a blue superman sweatshirt, seen worn by SMITH during the robberies of the McDonalds, Boost Mobile, and Metro PCS, all of which took place on January 25. Additionally, another cellular phone found in the Lexus was identified as having a latent print matching SMITH. Forensic testing of latent prints found on the Lexus matched record prints taken from SMITH and FORD. Also located in the Lexus was JONES' Texas Department of Criminal Justice identification card.
15. On January 26, 2015, FORD stated during a custodial interview that he was driving the LEXUS on January 25 and admitted that he fled from police. FORD also stated JONES was in the front passenger seat and "NU NU" and "NU NU's" brother were in the backseat.

16. On January 26, 2015, JONES stated during a custodial interview he was picked up in a white Lexus on January 25, 2015, by FORD, SMITH, and "NU NU". JONES identified "NU NU" as BLUFORD. JONES admitted to running during the vehicle pursuit because he was told the Lexus was stolen. JONES stated he was scared because he was on parole.
17. The Lexus was identified as having been reported stolen on January 18, 2015, during a carjacking.
18. SMITH, BLUFORD, FORD, and JONES are suspected of committing an additional 27 armed robberies between January 9, 2015 and January 25, 2015.
19. Based on the foregoing, I believe there is probable cause that on January 25, 2015, CALVIN JAMES SMITH, JERROL DEWAYNE BLUFORD, JAMONE EDUIN JONES, and RODNEY FORD did knowingly and intentionally combine, conspire, confederate, and agree with each other, and others known and unknown, to obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery in that the defendants did unlawfully take and obtain property, namely, United States currency, which was in the possession of an employee of the Metro PCS store located at 834 Little York, Houston, Texas, by means of actual and threatened force, violence and fear of injury to the employee of said store, and in the process of doing so did aid and abet and knowingly carry, and brandish a firearm, namely a handgun, during and in relationship to a crime of violence all in violation of 18 U.S.C. Sections 1951(a), 924c(1)(A)(ii) and 2.



Bryan M. Ellis
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before this 20th day of
April, 2015 and I find probable cause.


Francis H. Stroy
United States Magistrate Judge